

# EXHIBIT B

**UNITED STATE DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

LEAGUE OF WOMEN VOTERS  
OF MICHIGAN, ROGER J. BRDAK,  
FREDERICK C. DURHAL, JR.,  
JACK E. ELLIS, DONNA E.  
FARRIS, WILLIAM "BILL" J.  
GRASHA, ROSA L. HOLLIDAY,  
DIANA L. KETOLA, JON "JACK"  
G. LASALLE, RICHARD "DICK"  
W. LONG, LORENZO RIVERA  
and RASHIDA H. TLAIB,

Plaintiffs,

v.

RUTH JOHNSON, in her official  
Capacity as Michigan  
Secretary of State,

Defendant.

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Case No. 2:17-cv-14148

Hon. Eric L. Clay  
Hon. Denise Page Hood  
Hon. Gordon J. Quist

**NON-PARTY MICHIGAN  
REDISTRICTING RESOURCE  
INSTITUTE'S RESPONSES AND  
OBJECTIONS TO SUBPOENA**

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jhanselman@dykema.com

#### **NON-PARTY MICHIGAN REDISTRICTING RESOURCE INSTITUTE'S RESPONSES AND OBJECTIONS TO SUBPOENA**

Non-party Michigan Redistricting Resource Institute ("MRRI") by and through its undersigned counsel, objects to Plaintiffs' "Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises" (the

“Requests”), but without waiving Objections, provides the following Responses:

### **GENERAL OBJECTIONS**

The following general objections apply to each of Plaintiffs’ Requests, in addition to objections made within the response to particular requests:

1. MRRI objects to Plaintiffs’ Requests for the reasons set forth in its Motion to Quash Subpoenas and for Protective Order, and the accompanying Brief in Support, filed contemporaneously herewith.
2. MRRI objects to Plaintiffs’ Requests to the extent that they are overly broad, unduly burdensome, repetitive, irrelevant or not reasonably calculated to lead to the discovery of admissible evidence.
3. MRRI objects to Plaintiffs’ Requests to the extent that they purport to impose any obligation beyond the requirements imposed by the Federal Rules of Civil Procedure.
4. MRRI objects to those Requests that improperly seek the disclosure of information or documents that are privileged or confidential, that were prepared in anticipation of litigation or constitute attorney work product, or that are otherwise immune from discovery. Inadvertent production of such information or documents shall not constitute a waiver of any privilege or any other ground for objection to discovery with respect to any other information or documents.

5. MRRI objects to those Requests that are compound, vague, ambiguous or otherwise unclear as to the precise information or documents sought.

6. MRRI objects to Plaintiffs' Requests to the extent that they seek documents that are not within its possession, custody or control. Any response by MRRI that it will produce documents should not be construed to mean that such documents necessarily exist; instead, any such response should be understood to mean only that MRRI will endeavor, consistent with its obligations under the Federal Rules of Civil Procedure, to locate such documents if they exist and, if any such documents are located, they will be produced in accordance with MRRI's obligations under the Federal Rules of Civil Procedure and consistent with the terms of its answers.

7. MRRI objects to Plaintiffs' Requests to the extent that the documents sought therein can be obtained from other sources that are more convenient, less burdensome and/or less expensive.

8. MRRI's responses are based on the best information presently available, and MRRI reserves the right to amend or to supplement its answers if it obtains other or additional information or discovers other or additional documents, but states that it is not obligated to produce documents created after the date of Plaintiffs' Requests.

9. MRRI objects to the Requests to the extent that they request documents and information that are not reasonably accessible under Fed. R. Civ. P. 26(b)(2)(B) and other federal law.

10. Any inadvertent production of any document shall not be deemed or construed to constitute a waiver of any privilege or right. MRRI reserves the right to demand that Plaintiffs return any such document and all copies thereof.

11. In responding to any of the discovery requests, MRRI does not concede the relevance or materiality of the subject matter of the discovery request or of the information requested in response to the discovery request. Rather, the answers to each discovery request are made expressly subject to and without, in any way, waiving any question or questions as to the competency, relevancy, privilege, or admissibility of the responses given.

### **DOCUMENTS REQUESTED**

1. All Michigan Redistricting Plans.

**RESPONSE:** MRRI objects to this Request because it is overbroad, unduly burdensome, seeks information not relevant to this case, and has no temporal limitation, in effect seeking all Michigan Redistricting Plans ever created. In addition, the information is available to Plaintiffs in the public record.

However, without waiving any objection, MRRI states that it does not have any Redistricting Plans in its possession.

2. All documents constituting or reflecting communications related to the 2012 Michigan Redistricting.

**RESPONSE:** MRRI objects to this Request because it is vague, overbroad, unduly burdensome, and has no temporal limitation. This Court has frequently denied requests for “all information related to” a certain topic. *See, e.g., Phoenix Life Ins. Co v. Raider-Dennis Agency, Inc.*, No. 07-cv-15324, 2010 U.S. Dist. LEXIS 42826, at \*13 (E.D. Mich. Apr. 30, 2010). In addition, other than information that is equally available to Plaintiffs in the public record, MRRI objects to the extent the information is subject to the attorney-client privilege or attorney work product doctrine.

However, without waiving objections, MRRI provides the only documents in its possession, which are invoices related to redistricting. The invoices have been REDACTED in order to preserve attorney-client privileged communications and in order to protect attorney work product. The redacted provisions are also subject of the contemporaneously filed Motion to Quash.

3. All notes, summaries, reports, minutes, bills, amendments and any other documents, formal or informal, referring or relating to the 2012 Michigan Redistrict.

**RESPONSE:** MRRI objects to this Request because it is vague, overbroad, unduly burdensome, and has no temporal limitation. This Court has frequently denied requests for “all information related to” a certain topic. *See, e.g., Phoenix Life Ins. Co v. Raider-Dennis Agency, Inc.*, No. 07-cv-15324, 2010 U.S. Dist. LEXIS 42826, at \*13 (E.D. Mich. Apr. 30, 2010). In addition, other than information that is equally available to Plaintiffs in the public record, requests for internal notes, summaries, reports, amendments, and other documents are subject to the attorney-client privilege and attorney work product doctrine.

However, without waiving objections, MRRI provides the only documents in its possession, which are invoices related to redistricting. The invoices have been REDACTED in order to preserve attorney-client privileged communications and in order to protect attorney work product. The redacted provisions are also subject of the contemporaneously filed Motion to Quash.

4. All documents reflecting, referring to or relating to agreements with and/or payments to or from any person in connection with 2012 Michigan Redistricting.

**RESPONSE:** MRRI objects to this Request because it is vague, overbroad, unduly burdensome, and seeks information not relevant to this case. MRRI has no

way of knowing whether “any person,” possesses any document vaguely “reflecting, referring to or relating to” agreements or payments to “any person.”

However, without waiving objections, MRRI provides the only documents in its possession, which are invoices related to redistricting. The invoices have been REDACTED in order to preserve attorney-client privileged communications and in order to protect attorney work product. The redacted provisions are also subject of the contemporaneously filed Motion to Quash.

5. All documents reflecting amounts appropriated, billed and/or paid by any entity to any person in connection with the 2012 Michigan Redistricting.

**RESPONSE:** MRRI objects to this Request because it is vague, overbroad, unduly burdensome, and seeks information not relevant to this case. MRRI has no way of knowing what documents exist vaguely “reflecting amounts appropriated, billed, and/or paid” from “any entity,” to “any person.”

However, without waiving objections, MRRI provides the only documents in its possession, which are invoices related to redistricting. The invoices have been REDACTED in order to preserve attorney-client privileged communications and in order to protect attorney work product. The redacted provisions are also subject of the contemporaneously filed Motion to Quash.

6. All data consulted and analyses, forecasts, scenarios, simulations, models, and projections done in connection with the 2012 Michigan Redistricting.

**RESPONSE:** MRRI objects to this Request because it is vague, overbroad, unduly burdensome, and seeks information not relevant to this case. In addition, other than information that is equally available to Plaintiffs in the public record, requests for internal notes, summaries, reports, amendments, and other documents are subject to the attorney-client privilege and attorney work product doctrine.

However, without waiving objections, MRRI provides the only documents in its possession, which are invoices related to redistricting. The invoices have been REDACTED in order to preserve attorney-client privileged communications and in order to protect attorney work product. The redacted provisions are also subject of the contemporaneously filed Motion to Quash.

7. All documents constituting or reflecting, in whole or in part, communications to or from the Republican State Leadership Committee (RSLC) or other national organizations (including their members and staff) relating in any way to the 2012 Michigan Redistricting or redistricting in general.

**RESPONSE:** MRRI objects to this Request because it is overbroad, unduly burdensome, seeks information not relevant to this case, and has no temporal

limitation, in effect seeking “all documents” ever created relating to “redistricting in general.”

However, without waiving objections, MRRI provides the only documents in its possession, which are invoices related to redistricting. The invoices have been REDACTED in order to preserve attorney-client privileged communications and in order to protect attorney work product. The redacted provisions are also subject of the contemporaneously filed Motion to Quash..

8. All documents from or to, prepared or presented by, or related to Thomas Hofeller.

**RESPONSE:** MRRI objects to this Request because it is overbroad, unduly burdensome, seeks information not relevant to this case, and has no temporal limitation. This Court has frequently denied requests for “all information related to” a certain topic. *See, e.g., Phoenix Life Ins. Co v. Raider-Dennis Agency, Inc.*, No. 07-cv-15324, 2010 U.S. Dist. LEXIS 42826, at \*13 (E.D. Mich. Apr. 30, 2010). Specifically, MRRI states that any document somehow “related to Thomas Hofeller” has no bearing on the issues in this case. In addition, MRRI further relies on the general objections, including but not limited to the attorney-client privilege, attorney work product doctrine, and legislative privilege.

However, without waiving objections, MRRI provides the only documents in its possession, which are invoices related to redistricting. The invoices have

been REDACTED in order to preserve attorney-client privileged communications and in order to protect attorney work product. The redacted provisions are also subject of the contemporaneously filed Motion to Quash.

9. All PowerPoints or other outlines or presentations entitled “Redistricting 2010: Preparing for Success”; “Congressional Redistricting: Drawing Maps for the Next Five Elections”; “REDMAP Political Report June 2010”; and “REDMAP Political Report July 2010.”

**RESPONSE:** MRRI objects to this Request because it is overbroad, unduly burdensome, and not relevant to the facts of this case.

However, without waiving objections, MRRI provides the only documents in its possession, which are invoices related to redistricting. The invoices have been REDACTED in order to preserve attorney-client privileged communications and in order to protect attorney work product. The redacted provisions are also subject of the contemporaneously filed Motion to Quash.

10. All documents related or referring to “REDMAP.”

**RESPONSE:** MRRI objects to this Request because it is overbroad, unduly burdensome, seeks information not relevant to this case, and has no temporal limitation. This Court has frequently denied requests for “all information related

to" a certain topic. *See, e.g., Phoenix Life Ins. Co v. Raider-Dennis Agency, Inc.*, No. 07-cv-15324, 2010 U.S. Dist. LEXIS 42826, at \*13 (E.D. Mich. Apr. 30, 2010).

However, without waiving objections, MRRI provides the only documents in its possession, which are invoices related to redistricting. The invoices have been REDACTED in order to preserve attorney-client privileged communications and in order to protect attorney work product. The redacted provisions are also subject of the contemporaneously filed Motion to Quash.

Date: July 25, 2018

DYKEMA GOSSETT PLLC

By: \_\_\_\_\_

Gary P. Gordon (P26290)

Jason T. Hanselman (P61813)

Counsel for Non-Party Movants

Michigan Redistricting Resource  
Institute

201 Townsend Street, Suite 900  
Lansing, MI 48933

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Facsimile: (517) 374-9191

ggordon@dykema.com

jhanselman@dykema.com

**CERTIFICATE OF SERVICE**

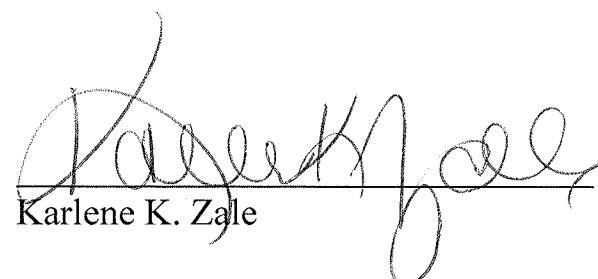
I hereby certify that on July 25, 2018, I hereby certify that I have mailed by United States Postal Service the foregoing Non-Party Michigan Redistricting Resource Institute's Responses And Objections To Subpoena to:

Mark Brewer  
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Robert P. Young, Jr.  
Ryan M. Shannon  
DICKINSON WRIGHT, PLLC  
215 S. Washington Square, Suite 200  
Lansing, MI 48933

  
Karlene K. Zale

# ATTACHMENT 1



Pd # 1084

NATIONAL CONFERENCE of STATE LEGISLATURES

*The Forum for America's Ideas*

1/18/2011

Mr. Daniel McMaster  
Michigan Legislature  
522 N Saginaw St  
Owosso, MI 48867  
517-202-9908

Hotel \$47.08  
Flight \$02.08  
Conference \$395.00  
Total \$444.16

Richard Moore  
Senator  
Massachusetts Senate  
President, NCSL

Tim Rice  
Executive Director  
Illinois Legislative Information System  
Staff Chair, NCSL

William Pound  
Executive Director

RE: Registration Update Notification

\$1,244.16

Thank you for registering to attend the Redistricting Seminar Washington, DC, to be held on 01/21/2011 at Gaylord National Hotel and Convention Center. Following are the details of your registration. See you in Forest Heights, MD.

**CONFIRMATION**

Meeting: Redistricting Seminar - Washington, Meeting Dates: 1/21/2011 - 1/24/2011

\*\* Delegate: Daniel McMaster

\*\* Confirmation No.: 1000180113

Registration Type: State Legislative Staff

Ribbon Type: FIRST

\*\* This delegate name and confirmation number are required to make changes.

Registration Fee: \$395.00 Paid: \$395.00 Registration Balance: \$ 0.00  
Fee Discounts: \$0.00 Refunds: \$0.00 Payment Type: Visa Online

Tour / Activity Fee(s): \$0.00 Paid: \$0.00 Tours / Activities Balance: \$ 0.00  
Discounts: \$0.00 Refunds: \$0.00 Payment Type: NONE

Tours / Activities Selected: NONE

Special Requirements: NONE

<b>TOTAL FEES:</b> \$395.00	<b>PAID:</b> \$395.00	<b>BALANCE DUE:</b> \$ 0.00
DISCOUNTS: \$0.00	REFUNDS: \$0.00	
SHIPPING: \$0.00	TAX: \$0.00	

Please allow 2-3 weeks for processing refunds.

Payments may be sent to NCSL Registration, 7700 E. First Place, Denver, CO, 80230.

If you have questions, please contact one of the following:

**Registration** -- Tricia Simmons((303) 856-1456, tricia.simmons@ncsl.org);

**Meeting Program** -- Tim Storey ((303) 856-1537, tim.storey@ncsl.org);

**Hotel** --

Cancellation and other NCSL meeting registration policies are published in the brochure and on the web at <http://www.ncsl.org/Default.aspx?TabID=714&tabs=2638,121,930#930>.

Denver  
7700 East First Place  
Denver, Colorado 80230  
Phone 303.364.7700 Fax 303.364.7800

Washington  
444 North Capital Street, N.W. Suite 515  
Washington, D.C. 20001  
Phone 202.624.5400 Fax 202.737.1069

Website [www.ncsl.org](http://www.ncsl.org)  
Email [info@ncsl.org](mailto:info@ncsl.org)



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OWOSO MI 48867

ROOM	AA 6305
ARRIVAL	1/21/11
DEPARTURE	1/23/11
NO. IN PARTY	1
GROUP I.D.	X-NRS11
PAGE	1
STATEMENT DATE	1/23/11

RESV NUMBER 405566054751  
FOLIO NUMBER 405636318482

DATE	DESCRIPTION	COMMENTS	CHARGES	PAYMENTS
1/21/11	RESORT FEE	RESORT FEE	15.90	
1/21/11	SELF PARKING	NO CAR OR NO DRIVE		
1/21/11	ROOM CHARGE AA 6305		179.00	
	TAX		28.64	
1/21/11	APPLIED DEPOSIT	*****0500		-207.64
1/21/11	CASH SETTLEMENT	0000		-100.00
1/22/11	RESORT FEE	RESORT FEE	15.90	
1/22/11	SELF PARKING	NO CAR OR NO DRIVE		
1/22/11	ROOM CHARGE AA 6305		179.00	
	TAX		28.64	
1/23/11	FD VISA	0211 *****0500		-139.44

TOTALS 447.08 -447.08

BALANCE DUE .00

Thank you for staying with us

Travel Document - Washington 1/21/11 - Yahoo! Mail

Page 2 of 5

**Class:** Economy Your flight is confirmed. The airline will assign seats at check-in or you may choose seats

View the latest airport conditions at: [CLE](#) | [DCA](#)

**Sunday, January 23, 2011**  
**Continental Airlines # 3111**

Washington Ronald Reagan National (DCA) to Cleveland Hopkins International (CLE)

**Departure (DCA):** January 23, 6:25 PM EST (evening)

**Arrival (CLE):** January 23, 7:37 PM EST (evening)

**Class:** Economy Your flight is confirmed. The airline will assign seats at check-in or you may choose seats

View the latest airport conditions at: [DCA](#) | [CLE](#)

**Sunday, January 23, 2011**  
**Continental Airlines # 8755**

Cleveland Hopkins International (CLE) to Flint Bishop (FNT)

**Departure (CLE):** January 23, 8:55 PM EST (evening)

**Arrival (FNT):** January 23, 9:57 PM EST (evening)

**Class:** Economy Your flight is confirmed. The airline will assign seats at check-in or you may choose seats

View the latest airport conditions at: [CLE](#)

**Have your travel plans changed?** Many tickets can be exchanged or canceled online by visiting "My trips" and clicking the Change/cancel airline ticket option.

### Cost and billing summary

### Booking Confirmation

**Total airfare: \$402.80USD (including taxes)**

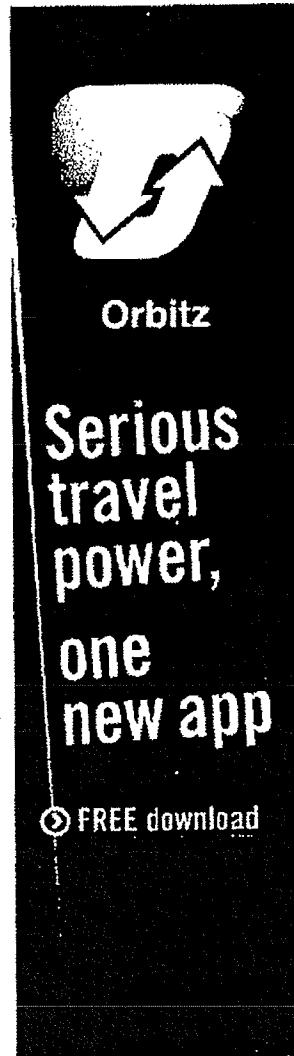
Price Assurance: Get a cash refund if another customer books the same flight at a lower price. How it works

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215 S. WASHINGTON SQUARE, SUITE 200  
LANSING, MI 48933-1816  
TELEPHONE: (517) 371-1730  
FACSIMILE: (517) 487-4700  
<http://www.dickinsonwright.com>

JEFFERY V. STUCKEY  
[JStruckey@dickinsonwright.com](mailto:JStruckey@dickinsonwright.com)  
(517) 487-4766

DA#1155

February 22, 2011

Via First-Class Mail

Mr. Robert S. LaBrant  
Senior Vice President; Political Affairs  
and General Counsel; Political Affairs  
Michigan Chamber of Commerce  
600 South Walnut Street  
Lansing, MI 48933

**Re: Michigan Redistricting Resource Institute – Redistricting 2011  
Invoice for Services**

Dear Mr. LaBrant:

Enclosed is our firm's invoice for services for the period ending January 31, 2012.

Should you have any questions, please call.

Very truly yours,

Jeffery V. Stuckey

PHE/mds  
Enclosure  
cc: Peter H. Ellsworth

LANSING 49653-1 452096

RECORDED MAIL  
RECORDED MAIL

C O U N S E L O R S A T L A W

DETROIT NASHVILLE WASHINGTON, D.C. TORONTO PHOENIX LAS VEGAS  
BLOOMFIELD HILLS ANN ARBOR LANSING GRAND RAPIDS

IN ACCOUNT WITH



215 S. WASHINGTON SQUARE, SUITE 200  
LANSING, MICHIGAN 48933-1816  
TELEPHONE: (517) 371-1730  
<http://www.dickinsonwright.com>  
FEDERAL I.D. #38-1364333

FEBRUARY 20, 2012

INVOICE NO. 798235

MICHIGAN CHAMBER OF COMMERCE  
600 SOUTH WALNUT STREET  
LANSING, MI 48933

ATTN: ROBERT LABRANT

RE: REDISTRICTING 2011

CLIENT/MATTER NO. 049653-00001

STATEMENT FOR LEGAL SERVICES RENDERED in connection with the above-referenced matter per the attached detail through January 31, 2012 . . . . .	66,751.50
DISBURSEMENTS per the attached detail . . . . .	1,337.21
TOTAL:	68,088.71

IN ACCOUNT WITH



215 S. WASHINGTON SQUARE, SUITE 200  
LANSING, MICHIGAN 48933-1816  
TELEPHONE: (517) 371-1730  
<http://www.dickinsonwright.com>  
FEDERAL I.D. #38-1364333

049653-00001  
MICHIGAN REDISTRICTING RESOURCE INSTITUTE  
REDISTRICTING 2011

INVOICE NO. 798235  
PAGE 2

	2.90
	10.70
	3.10
	9.50
	5.00
	1.40
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	2.70

IN ACCOUNT WITH



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049653-00001  
MICHIGAN REDISTRICTING RESOURCE INSTITUTE  
REDISTRICTING 2011

INVOICE NO. 798235  
PAGE 3

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	2.60
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	.80
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REDISTRICTING 2011

INVOICE NO. 798235  
PAGE 4

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	2.30
	13.20
	4.50
	2.70
	1.40
	3.60
	3.40
	3.00

IN ACCOUNT WITH



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MICHIGAN REDISTRICTING RESOURCE INSTITUTE  
REDISTRICTING 2011

INVOICE NO. 798235  
PAGE 5

	3.40
	7.80
	2.00
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IN ACCOUNT WITH



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REDISTRICTING 2011

INVOICE NO. 798235  
PAGE 6

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	6.90
	2.50
	2.70
	3.90
	3.20
	3.00
	1.70
	.90

IN ACCOUNT WITH



215 S. WASHINGTON SQUARE, SUITE 200  
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FEDERAL I.D. #38-1364333

049653-00001  
MICHIGAN REDISTRICTING RESOURCE INSTITUTE  
REDISTRICTING 2011

INVOICE NO. 798235  
PAGE 7

	1.00
	2.70
	12.20
	1.30
	1.80
	2.50
	.20
TOTAL HOURS	184.80
TOTAL SERVICES. . . . .	\$ 66,751.50

IN ACCOUNT WITH



215 S. WASHINGTON SQUARE, SUITE 200  
LANSING, MICHIGAN 48933-1816  
TELEPHONE: (517) 371-1730  
<http://www.dickinsonwright.com>  
FEDERAL I.D. #38-1364333

049653-00001	INVOICE NO. 798235	
MICHIGAN REDISTRICTING RESOURCE INSTITUTE	PAGE 8	
REDISTRICTING 2011		
DATE	DISBURSEMENTS	VALUE
CERT. COPIES/OFFL RECORDS		86.96
REPRODUCTION-INSIDE FIRM		111.40
TELEPHONE		2.10
COMPUTERIZED LGL RESEARCH		1,086.24
01/10/12 TRAVEL EXPENSES -- VENDOR: PETER H. ELLSWORTH		50.51
TOTAL DISBURSEMENTS. . . . .	\$ 1,337.21	
TOTAL CURRENT CHARGES. . . . .	\$ 68,088.71	

-----TIME AND FEE SUMMARY-----*			
*-----TIMEKEEPER-----*	RATE	HOURS	FEES
P H ELLSWORTH	540.00	43.80	23652.00
J V STUCKEY	450.00	51.30	23085.00
R M SHANNON	225.00	78.50	17662.50
A M WENNER	210.00	11.20	2352.00
TOTALS	184.80		66751.50

DICKINSON  
WRIGHT PLC

215 S. WASHINGTON SQUARE, SUITE 200  
LANSING, MICHIGAN 48933-1816  
TELEPHONE: (517) 371-1730  
FACSIMILE: (517) 487-4700  
<http://www.dickinsonwright.com>

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[PEllsworth@dickinsonwright.com](mailto:PEllsworth@dickinsonwright.com)  
(517) 487-4710

March 30, 2011

Via First-Class Mail

Mr. Robert S. LaBrant  
Senior Vice President; Political Affairs  
and General Counsel; Political Affairs  
Michigan Chamber of Commerce  
600 South Walnut Street  
Lansing, MI 48933

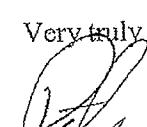
**Re: Michigan Redistricting Resource Institute – 2010 Census and  
Redistricting  
Invoice for Services**

Dear Mr. LaBrant:

Enclosed is our firm's invoice for services from January 1, 2011 through February 28, 2011.

Should you have any questions, please call.

Very truly yours,

  
Peter H. Ellsworth

PHE/mds  
Enclosures  
cc: Jeffery V. Stuckey

LANSING 49653-1 452096v1

C o u n s e l o r s A t L a w  
DETROIT NASHVILLE WASHINGTON, D.C. TORONTO PHOENIX  
BLOOMFIELD HILLS ANN ARBOR LANSING GRAND RAPIDS

IN ACCOUNT WITH



215 S. WASHINGTON SQUARE, SUITE 200  
LANSING, MICHIGAN 48933-1816  
TELEPHONE: (517) 371-1730  
<http://www.dickinsonwright.com>  
FEDERAL I.D. #38-1364333

MARCH 30, 2011

INVOICE NO. 755815

MICHIGAN CHAMBER OF COMMERCE  
600 SOUTH WALNUT STREET  
LANSING, MI 48933

ATTN: ROBERT LABRANT

RE: REDISTRICTING 2011

CLIENT/MATTER NO. 049653-00001

STATEMENT FOR LEGAL SERVICES RENDERED in connection with the above-referenced matter per the attached detail through February 28, 2011. . . . .	67,748.00
DISBURSEMENTS per the attached detail . . . . .	3,357.81
TOTAL:	71,105.81

=====

IN ACCOUNT WITH



215 S. WASHINGTON SQUARE, SUITE 200  
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049653-00001  
MICHIGAN REDISTRICTING RESOURCE INSTITUTE  
REDISTRICTING 2011

INVOICE NO. 755815  
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PAGE 3

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PAGE 9

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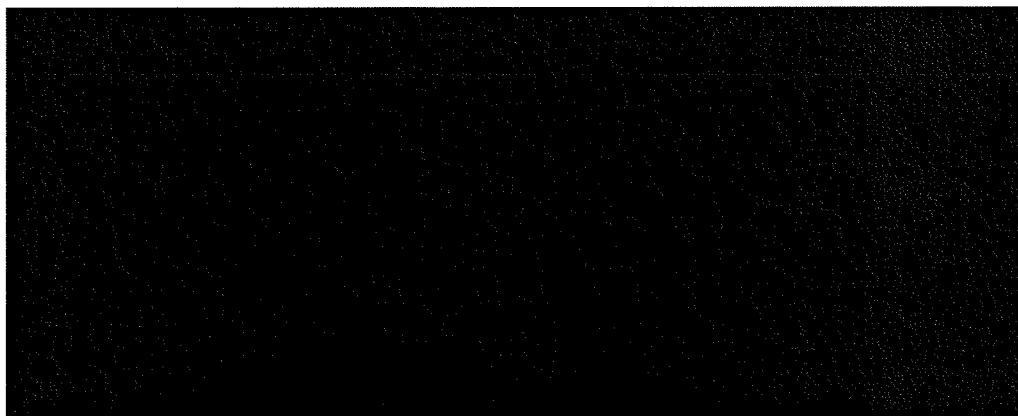
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REDISTRICTING 2011

INVOICE NO. 755815  
PAGE 10



TOTAL HOURS 238.01  
TOTAL SERVICES. . . . . \$ 67,748.00

DATE	DISBURSEMENTS	VALUE
REPRODUCTION-INSIDE FIRM		2.40
COMPUTERIZED LGL RESEARCH		3,355.41
TOTAL DISBURSEMENTS. . . . .	\$	3,357.81
TOTAL CURRENT CHARGES. . . . .	\$	71,105.81

\*-----TIME AND FEE SUMMARY-----\*

TIMEKEEPER	RATE	HOURS	FEES
P H ELLSWORTH	510.00	38.10	19431.00
J V STUCKEY	425.00	16.90	7182.50
R M SHANNON	205.00	104.40	21402.00
M J PATTWELL	244.96	31.16	7633.00
M D BOSSENBROEK	254.99	47.45	12099.50
TOTALS		238.01	67748.00



215 S. WASHINGTON SQUARE, SUITE 200  
LANSING, MI 48933-1816  
TELEPHONE: (517) 371-1730  
FACSIMILE: (517) 487-4700  
<http://www.dickinsonwright.com>

JEFFERY V. STUCKEY  
JStuckey@dickinsonwright.com  
(517) 487-4766

PJ HK

March 28, 2011

Via Email

Mr. Robert S. LaBrant  
Senior Vice President; Political Affairs  
and General Counsel; Political Affairs  
Michigan Chamber of Commerce  
600 South Walnut Street  
Lansing, MI 48933

**Re: Michigan Redistricting Resource Institute – Redistricting 2011  
Invoice for Services**

Dear Mr. LaBrant:

Enclosed is our firm's invoice for services for the period ending February 29, 2012.

Should you have any questions, please call.

Very truly yours,

Jeffery V. Stuckey

PHE/mds  
Enclosure  
cc: Peter H. Ellsworth

LANSING 49653-1452096

C O U N S E L O R S A T L A W

DETROIT      NASHVILLE      WASHINGTON, D.C.      TORONTO      PHOENIX      LAS VEGAS  
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MARCH 27, 2012

INVOICE NO. 803037

MICHIGAN CHAMBER OF COMMERCE  
600 SOUTH WALNUT STREET  
LANSING, MI 48933

ATTN: ROBERT LABRANT

RE: REDISTRICTING 2011

CLIENT/MATTER NO. 049653-00001

TOTAL: 74,806.44

IN ACCOUNT WITH



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REDISTRICTING 2011

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PAGE 2

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PAGE 3

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PAGE 8

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INVOICE NO. 803037  
PAGE 9

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INVOICE NO. 803037  
PAGE 10

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INVOICE NO. 803037  
PAGE 11



TOTAL HOURS 213.40  
TOTAL SERVICES. . . . . \$ 73,788.00

DATE	DISBURSEMENTS	VALUE
REPRODUCTION-INSIDE FIRM		217.60
TELEPHONE		.84
COMPUTERIZED LGL RESEARCH		800.00
TOTAL DISBURSEMENTS. . . . .	\$ 1,018.44	
TOTAL CURRENT CHARGES. . . . .	\$ 74,806.44	

TIME AND FEE SUMMARY			
TIMEKEEPER	RATE	HOURS	FEES
P H ELLSWORTH	540.00	33.50	18090.00
J V STUCKEY	450.00	68.90	31005.00
P J DEROSIER	385.00	.90	346.50
R M SHANNON	225.00	81.70	18382.50
S M MAXWELL	210.00	2.30	483.00
A M WENNER	210.00	26.10	5481.00
TOTALS		213.40	73788.00

DICKINSON  
WRIGHT PLLC

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TELEPHONE: (517) 371-1730  
FACSIMILE: (517) 487-4700  
<http://www.dickinsonwright.com>

PETER H. ELLSWORTH  
[PEllsworth@dickinsonwright.com](mailto:PEllsworth@dickinsonwright.com)  
(517) 487-4710

May 2, 2011

*Pd #1099* Via First-Class Mail

Mr. Robert S. LaBrant  
Senior Vice President; Political Affairs  
and General Counsel; Political Affairs  
Michigan Chamber of Commerce  
600 South Walnut Street  
Lansing, MI 48933

**Re: Michigan Redistricting Resource Institute – 2010 Census and  
Redistricting  
Invoice for Services**

Dear Mr. LaBrant:

Enclosed is our firm's invoice for services for the period March 1, 2011 through March 31, 2011.

Should you have any questions, please call.

Very truly yours,

*Peter H. Ellsworth*  
Peter H. Ellsworth

PHE/mds  
Enclosures  
cc: Jeffery V. Stuckey

LANSING 49653-1 452096v2

IN ACCOUNT WITH



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APRIL 29, 2011

INVOICE NO. 759952

MICHIGAN CHAMBER OF COMMERCE  
600 SOUTH WALNUT STREET  
LANSING, MI 48933

ATTN: ROBERT LABRANT

RE: REDISTRICTING 2011

CLIENT/MATTER NO. 049653-00001

STATEMENT FOR LEGAL SERVICES RENDERED  
in connection with the above-referenced  
matter per the attached detail through  
March 31, 2011 . . . . . 39,052.00

DISBURSEMENTS per the attached  
detail . . . . . 5,306.53  
-----

TOTAL: 44,358.53  
=====

IN ACCOUNT WITH



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INVOICE NO. 759952  
PAGE 2

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PAGE 3

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PAGE 4

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REDISTRICTING 2011

INVOICE NO. 759952  
PAGE 6

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TOTAL HOURS 114.20  
TOTAL SERVICES. . . . . \$ 39,052.00

DATE	DISBURSEMENTS	VALUE
REPRODUCTION-INSIDE FIRM		2.40
DELIVERY EXPENSE		1.52
COMPUTERIZED LGL RESEARCH		5,302.61
TOTAL DISBURSEMENTS. . . . .	\$	5,306.53
TOTAL CURRENT CHARGES. . . . .	\$	44,358.53

\*-----TIME AND FEE SUMMARY-----\*

TIMEKEEPER	RATE	HOURS	FEES
P H ELLSWORTH	510.00	32.60	16626.00
J V STUCKEY	425.00	25.90	11007.50
R M SHANNON	205.00	55.70	11418.50
TOTALS		114.20	39052.00



215 S. WASHINGTON SQUARE, SUITE 200  
LANSING, MI 48933-1816  
TELEPHONE: (517) 371-1730  
FACSIMILE: (517) 487-4700  
<http://www.dickinsonwright.com>

JEFFERY V. STUCKEY  
[JStuckey@dickinsonwright.com](mailto:JStuckey@dickinsonwright.com)  
(517) 487-4766

May 31, 2011

Via First-Class Mail

Mr. Robert S. LaBrant  
Senior Vice President; Political Affairs  
and General Counsel; Political Affairs  
Michigan Chamber of Commerce  
600 South Walnut Street  
Lansing, MI 48933

Re: Michigan Redistricting Resource Institute – 2010 Census and  
Redistricting  
Invoice for Services

Dear Mr. LaBrant:

Enclosed is our firm's invoice for services for the period April 1, 2011 through April 30, 2011.

Should you have any questions, please call.

Very truly yours,

Jeffery V. Stuckey

PHE/mds  
Enclosures  
cc: Peter H. Ellsworth

LANSING 49653-1 452096v3

C O U N S E L O R S A T L A W

DETROIT      NASHVILLE      WASHINGTON, D.C.      TORONTO      PHOENIX      LAS VEGAS  
BLOOMFIELD HILLS      ANN ARBOR      LANSING      GRAND RAPIDS

IN ACCOUNT WITH

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LANSING, MICHIGAN 48933-1816  
TELEPHONE: (517) 371-1730  
<http://www.dickinsonwright.com>  
FEDERAL I.D. #38-1364333

---

MAY 25, 2011

INVOICE NO. 763743

MICHIGAN CHAMBER OF COMMERCE  
600 SOUTH WALNUT STREET  
LANSING, MI 48933

ATTN: ROBERT LABRANT

RE: REDISTRICTING 2011

CLIENT/MATTER NO. 049653-00001

STATEMENT FOR LEGAL SERVICES RENDERED  
in connection with the above-referenced  
matter per the attached detail through  
April 30, 2011 . . . . .

DISBURSEMENTS per the attached  
detail . . . . .

TOTAL:

26,974.50

216.29

27,190.79

---

IN ACCOUNT WITH



215 S. WASHINGTON SQUARE, SUITE 200  
LANSING, MICHIGAN 48933-1816  
TELEPHONE: (517) 371-1730  
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MICHIGAN REDISTRICTING RESOURCE INSTITUTE  
REDISTRICTING 2011

INVOICE NO. 763743  
PAGE 2

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TELEPHONE: (517) 371-1730  
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REDISTRICTING 2011

INVOICE NO. 763743  
PAGE 3

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PAGE 4

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LANSING, MICHIGAN 48933-1816  
TELEPHONE: (517) 371-1730  
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FEDERAL I.D. #38-1364333

049653-00001  
MICHIGAN REDISTRICTING RESOURCE INSTITUTE  
REDISTRICTING 2011

INVOICE NO. 763743  
PAGE 5

1.10

2.40

1.30

3.30

2.30

TOTAL HOURS	59.90
TOTAL SERVICES . . . . .	\$ 26,974.50

DATE	DISBURSEMENTS	VALUE
TELECOMMUNICATIONS		88.09
REPRODUCTION-INSIDE FIRM		128.20
TOTAL DISBURSEMENTS . . . . .	\$ 216.29	-----
TOTAL CURRENT CHARGES . . . . .	\$ 27,190.79	=====

\*-----TIME AND FEE SUMMARY-----\*

TIMEKEEPER	RATE	HOURS	FEES
P H ELLSWORTH	510.00	23.80	12138.00
J V STUCKEY	425.00	33.80	14365.00
R M SHANNON	205.00	2.30	471.50
TOTALS		59.90	26974.50

retainer amount. Any unused portion of the retainer remaining after all legal services have been paid for will be nonrefundable. You will not earn or be paid interest on the retainer fee balance.

8. ***Conflicts of Interest.*** Conflicts of interest are a concern for Dickinson Wright PLLC and the clients we represent. We attempt to identify actual and potential conflicts at the outset of any engagement, and may request that you sign a conflict waiver before we accept an engagement from you. Occasionally, other clients or prospective clients may ask us to seek a conflict waiver from you so that we can accept an engagement on their behalf. Please do not take such a request to mean that we will represent you less zealously; rather, that we take our professional responsibilities to all clients and prospective clients very seriously.

Unfortunately, conflicts sometimes arise or become apparent after work begins on an engagement. When that happens, we will do our best to address and resolve the situation in the manner that is consistent with our professional responsibilities.

We will not represent any other client on any matter on which we are representing you unless we have your express agreement that we may do so, and where permitted to do so by the applicable jurisdiction's Rules of Professional Conduct.

We may also act generally for another client which, for you, is a market competitor.

9. ***Liability Insurance Coverage.*** It is your responsibility to ascertain whether you are covered by any relevant insurance in respect of either liability or legal expenses. If so, you are responsible to notify your insurer(s) of the claim or potential claim and our involvement as soon as possible. It is also your responsibility to inform us if you believe that you have insurance coverage for the specific matter for which we have been retained.

10. ***Termination of Representation.*** You may terminate our representation at any time, with or without reason. We have a right to discontinue providing services under certain circumstances, such as your failure to fulfill your financial obligations to us. Your termination of our representation in no way relieves you of the obligation to pay for legal services that have been provided prior to the time of termination and that are necessitated to make an orderly transfer of our file materials.

Upon termination of our representation for any reason, we will return your papers, documents and other property to you upon receipt of your request for them. We may, and likely will, retain a copy of the materials returned to you. If you have outstanding invoices owing to the Firm, we may have the right to retain your documents if they are properly subject to a lien.

At such time as we have completed the scope of work for which we have been retained, we will consider our

representation to have ended. If you later retain us to perform further or additional work, our future representation will be subject to the terms of and understanding set forth herein, unless other terms and conditions are expressly agreed to.

11. ***Records Retention.*** Subject to paragraph 10 above, any materials belonging to you will be returned to you at the conclusion of the engagement. Following the engagement, in accordance with Firm policies, applicable law and the applicable jurisdiction's Rules of Professional Conduct regarding ownership of files and file retention, we will retain our files relating to this matter for a period of years, after which time the files may be destroyed. We will make reasonable efforts to notify you prior to the destruction of any files. A reasonable charge may be imposed for any special requests pertaining to disposition or handling of our files.

12. ***E-Mail and Cellular Phone Authorization.*** Dickinson Wright PLLC is able to communicate with clients via electronic mail over the Internet ("e-mail") and many of our attorneys utilize cellular phones. With e-mail, current technology cannot eliminate the risk that confidences and/or secrets otherwise protected by attorney/client privilege may be viewed by unauthorized third parties and the privilege thereby lost. As to both means of communication, sensitive, confidential and proprietary materials of the client may be intercepted by unauthorized third parties. Please be advised that in connection with the use of e-mail and cellular phones, (a) there is the risk of the loss of the attorney/client privilege and that sensitive, confidential or proprietary material may be inadvertently disclosed to unauthorized third parties; (b) Dickinson Wright PLLC does not currently utilize encryption technology or other equivalent security systems when sending information over the internet; and (c) you have the right to specifically direct Dickinson Wright PLLC not to send the client sensitive, confidential or proprietary materials via e-mail or to utilize a cellular phone when communicating.

Unless you specifically provide direction to the contrary, your acceptance of our engagement letter will indicate your review of this policy statement on the use of e-mail and cellular phones and will specifically authorize Dickinson Wright PLLC to utilize e-mail, to send information over the Internet to communicate with you and with third parties, and to utilize cellular phones. By engaging our Firm, you agree to assume the risk of inadvertent disclosure and the risk of the loss of attorney/client privilege as it relates to information being transmitted. You retain the right to direct Dickinson Wright PLLC not to send specific items of information via the Internet, by e-mail or over a cellular phone. This authorization shall remain in effect until revoked in writing.

Please feel free to contact the attorney at the Firm responsible for the matters you have engaged us to address on your behalf if you have any questions regarding this policy.